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ABSTRACT

Within the last 50 years, the work-family-household arrangements upon which social policy systems in industrial nations were formulated have disappeared. This briefing paper examines how social policies of the United States, Japan, Germany, Italy, and France have responded. The paper is presented in two major sections. The first section describes family policies in each country concerning parental leave, child benefits/family allowances, child care, marriage/cohabitation, and divorce. The second section discusses the mixed effects of maternity leave on women's employment, the lack of a relationship between fertility and maternity leave and fertility and cash benefits, and factors that complicate the relationship between countries' social spending and child poverty. Job-protected maternity leave is described as the most basic entitlement reflecting public acknowledgment of the economic necessity of working motherhood. Analyses suggest that fertility rates do not seem responsive to cash benefits or other policies, such as extended maternity leave, that function as wages for motherhood. In countries where child care provisions are not widely available, lengthy paid leaves have the effect of bringing women into the home for long periods of time. The most important role of cash benefits is to reduce child poverty, as illustrated by patterns in the U.S., France, and Germany. The paper concludes by asserting that Western European nations' family policy can be divided into two types, one in which the social welfare system provides a comprehensive array of universal family benefits and services, and the other in which benefits are nonuniversal and accompanied by higher child poverty rates. The United States fits neither of the European patterns and is characterized by several contradictions contributing to the lack of political support for families. (Contains 98 references.) (KB)

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May 2003

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Family Policy in the US, Japan, Germany, Italy and France: Parental Leave, Child Benefits/Family Allowances, Child Care, Marriage/Cohabitation, and Divorce

A Briefing Paper Prepared for the Council on Contemporary Families
By CCF Intern Rachel Henneck
May 2003

Twentieth century social policy in industrial nations was originally formulated on the assumption that one particular family model was both the most prevalent and the most desirable. A family was supposed to consist of a married couple — one male breadwinner and one female homemaker — and their children, and the wages of a man were assumed to be enough to support a wife and children. Almost all women were assumed to be housewives.

Accordingly, women and children's access to market income was organized through marriage, as was their access to social insurance. Male workers could claim social insurance benefits for themselves and their dependents from the state, unions, employers and other institutions, but women seldom had any way to make claims independently. When husbands died, widows with children could draw pensions from the state and/or receive aid from the husband's union, while women without husbands usually had no legal way to make such claims. At the same time, work was organized on the assumption that all men were married to women who could devote their time and labor to the care of children.

In the last 50 years, however, the work-family-household arrangements on which this system was based have disappeared. As early as the second half of the twentieth

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century, the employment of married women increased dramatically in Europe and the US, and to a lesser extent in Japan (Thistle 16). By the 1980s, "mother" and "worker" were no longer mutually exclusive roles and the workplace was no longer occupied primarily by men without caregiving responsibilities. At the same time, the number of women and children who have access to a husband's wage and pension benefits has decreased. Starting about 30 years ago, even before divorce laws were liberalized in some countries, divorce rates began to rise across Europe and North America (Festy 312). Households headed by unmarried women have increased along with divorce rates, and cohabitation, both prior to marriage and as an alternative to marriage, is on the rise. More women are mothers without being wives.

In the space of about 30 years, the institution of marriage lost its dominance as the main mechanism by which income is distributed to women and children, while the workplace lost its status as a place where employees' family responsibilities could be ignored. The private, unpaid, 24-hour caregiving work of women can no longer be taken for granted by employers or society as a whole, nor can it be taken for granted that most women and children have access to a full-time male worker's income and benefits. How have industrial nations changed, or failed to change, their social policies in response?

In the US, Japan, Germany, France, and Italy, the family remains the most important provider of direct care for children and market earnings are the primary source of most families' income. But since women's move into the work force has thrown into question so much about caring for children that had previously been taken for granted, the state has gotten involved in making sure that women still can provide care while being workers. To a greater or lesser extent, job-protected parental leave policy has

helped ease tension between the mother and worker roles. Many countries have subsidized child care to ensure that children have access to high-quality care while their parents work. Child benefits and family allowances, which originated when the political goal was to keep women in the home and encourage childbearing, have in some cases remained an important benefit in countries with high rates of maternal employment. These state policies and provisions, however, vary enormously.

The US, for example, encourages families to seek market-based solutions to work-family conflict. Little attempt is made to subsidize women to drop out of the work force, but there is also little attempt to subsidize family caregiving for working mothers. Social supports for working mothers and their children are primarily reserved for only the most impoverished families. Italy and Germany, on the other hand, encourage women to drop out of the work force for long periods of time by offering lengthy paid leave, which get much higher fiscal and social priority than investments in child care. In Japan, family policy benefits have developed considerably in recent years, due to the increase in working mothers and concern about the birth rate, but the private homemaker-breadwinner household is still the normative expectation. France represents a different model, subsidizing child care rather than solely lengthy leave provision for women. With 95 percent of its three- to five-year-olds in public child care and preschools, France enables mothers to participate in the labor market (Lewis 164). In Germany, Italy, and Japan, however, child care is more scare and short school hours make it very difficult for both parents to work full-time.

Maternity/parental leave is the most basic entitlement for working women, requiring employers to give workers their jobs back after taking necessary time off to

give birth. The US introduced its first federal *unpaid* family and medical leave policy in 1993 for workers at medium- to large-sized firms. In France, the first *paid* maternity leave legislation was implemented eighty years earlier, in 1913 (Lewis 166). The length of leave varies between the countries discussed in this paper from up to three months unpaid in the US for some workers (partially paid in several states), to about three months at 60 percent pay in Japan (the rest of the first year at 40 percent pay), to three years paid in Germany and France. Italy offers an additional 5 years unpaid after the first three paid years.

Child benefits and family allowances, in the form of birth payments and/or monthly allowances that pay a certain amount for each child, are often means-tested or limited to those whose income is below a certain threshold, though most Western European countries also offer a basic benefit universally. Countries that offer universal benefits, such as France, tend to have lower poverty rates—particularly among single-mother households, which are especially vulnerable to poverty—than those targeting low-income groups exclusively, such as the US.

In European countries, and very recently in Japan, a strong impetus for the earliest child benefit legislation was concern about population decline due to low fertility. Pronatalist policy gives women greater cash benefits for bearing additional children, but it's important to note that the benefits have not so far actually served to spur population growth: Despite pronatalist efforts, fertility remains low in France, Germany, Italy and Japan, but in the US, which has no pronatalist political agenda, fertility is highest at around 2.1 children per woman.

The extent to which a country makes child care services available and accessible, and how sufficient are funds provided for child care to meet the demand for them, reflect beliefs about the centrality of parental care. For example, much of the antipathy toward child care (public or private sector) among Americans stems from the belief that non-parents can never give as good care to a child as his or her 'real' parents. Despite its appearance as sweeping new legislation, Germany's recent measure entitling every child between three and six a place in a day care center also reflects Germany's typical preference for private at-home care by mothers, since the centers are part-time and relatively expensive, and thus incompatible with work hours (Bettio and Prechal 31). France, on the other hand, sees its public child care/nursery schools as a way to ensure high-quality early childhood education for all children and enhance community cohesion. Even many stay-at-home mothers in France send their children to the public nursery schools (Bergmann).

Child care provisions also have economic consequences for working parents. In the US, child care costs eat up one quarter of the income of families in poverty (Blau 9), while low-income parents in France typically pay nothing for child care. These provisions and assumptions can restrict or open up opportunities in the workplace for mothers. In a study of Detroit-area mothers, every third woman interviewed reported that problems with child care accessibility constrained her employment (Hank and Kreyenfeld 3).

The extent to which benefits continue to be conditioned on marriage is important as well. In all these countries except Japan, a substantial minority of children are born out of wedlock and about half spend some part of their childhood without married

parents. Countries like the US and Germany give married couples a special place in the tax structure, a privilege Germany reserves for heterosexual marriages even though the country recently legalized same-sex registered partnerships.

Yet some policies exclude contemporary married couples from benefits. The joint-filing system of taxation in the US and Germany is a privilege for married couples, but it has become a penalty for many dual-earner couples in the US. Two incomes combined push the couple into a higher tax bracket than each would have been in if they filed as singles. The lower income of the two earners (usually the woman) is thus taxed at a higher marginal rate (Crittenden). Also, 16 states still penalize married-couple families in their welfare policies.

US

Compared to the scope of and level of support offered by family policies of France, Germany and Italy, the US appears to have a low level of political commitment to the well-being of families, lacking even the guarantee of unpaid leave to all workers.

American family policy is not undeveloped because American working families don't need support: 59 percent of women with children under one year are employed and even among married-couple families, 51 percent are dual-earner (Lewin). 55 percent of families put their youngest child in non-parental care (Blau 69). Despite the fact that most mothers work for pay outside the home, individual families are expected to work things out for child care between themselves and the market. The US has no public system of child care, and only about 10 percent of families receive child care subsidy (other than the child care tax credit).

Also, there is no universal cash benefit for families with children, only indirect tax credits. Deductions and exemptions go to those who make enough to owe taxes, while the means-tested Earned Income Tax Credit is for the working poor and welfare benefits are for very impoverished families. The most active domain of US family policy with the widest range of benefits is that which serves the poorest of the poor. Federal welfare policy offers means-tested benefits through the Temporary Assistance to Needy Families (TANF) program. TANF was meant to fix the old US welfare policy problem of anti-work incentives by requiring recipients to get jobs within a short period of time and placing a five-year lifetime limit on receipt of aid. TANF is distributed from federal block grants largely at the discretion of individual states.

Parental Leave

The first and only federal parental leave legislation to be enacted in the United States was the 1993 Family and Medical Leave Act. It requires that those who employ 50 or more workers offer up to 12 weeks of unpaid job-protected leave for pregnancy and childbirth or medical disabilities (Blau and Ehrenberg 10). The FMLA also guarantees continued health insurance coverage during the leave for those whose employers offer health care insurance to current workers (Waldfogel 95). Under the FMLA, 'child' is defined not only as biological or adopted children, but also includes stepchildren, foster children, legal wards, and children of people acting 'in loco parentis' (Mitchell 275).

Because the FMLA doesn't cover small firms, an estimated one-half of workers are left ineligible. But even many eligible employees do not take leave. According to the

U.S. Commission on Leave, 64 percent of employees who need to but do not take FMLA leave give the reason that they can't afford the loss of pay (Gornick and Meyers 3).

Some states have implemented programs that make parental leave more accessible. The most significant is California's new paid family leave law, which will go into effect in 2004. It will provide workers who pay into the state's disability insurance program (13 million of California's 16 million workers) with six weeks of job-protected leave at about half-salary (up to a limit of $728 per week) to care for a new child or an ill child, parent, spouse or domestic partner. If employers will not give the leave, workers can quit and still collect benefits, which are funded completely by payroll deductions for disability insurance. Employers may require workers to use up to two weeks of their vacation time before receiving paid leave benefits (Edds).

For those meeting income eligibility requirements, Minnesota's At-Home Infant Care program pays parents 75% of the maximum rate payable for full-time care of infants in a licensed family day care. Montana has a similar program, and in Missouri, 1998 legislation set up the "Early Childhood Development Fund," which comes from a portion of revenues from entrance fees to Riverboat Casinos. One of its programs subsidizes eligible low-income families who complete a course and choose to care for their infants or toddlers at home (National Partnership).

Aside from California, New Jersey and New York offer partial wage replacement during pregnancy and childbirth through their Temporary Disability Insurance (TDI) programs, and legislators in other states are trying to pass similar measures (National Partnership). Many states give some public employees the right to use their accrued paid sick leave for the care of family members. As of the early 1990s, one-quarter of

American women were estimated to have coverage under laws providing TDI benefits during FMLA and/or additional state-provided leave (Gornick and Meyers 3).

Child Benefits/Family Allowances

Although the US reserves most of its youth subsidy for those who reach college age and offers no universal benefit for children, several tax credits and exemptions are available to families with children, although they exclude those who don't make enough to owe taxes or those who don't file. Families with one or more dependent children under age 17 may claim a child tax credit of $600 (IRS). Taxpayers may reduce their taxable income by claiming a $2,900 exemption for each dependent (including children and people who received at least half their financial support from the taxpayer) (IRS).

Many low-income workers with at least two children receive refundable Earned Income Tax Credits of up to $3,816 per year (Coontz and Folbre), while parents with one child are eligible for an earned income credit of up to $2,353 (Berube and Forman 2). The Earned Income Tax Credit targets the working poor and is worth forty cents for every earned dollar for those earning between $8,900 and $11,610 (Legislative Analyst's Office). However, it phases out rapidly after income reaches $12,460, which could be considered a penalty for dual-earner families. The credit is zero when income reaches $30,580. Still, the EITC is a very important subsidy for the people who receive it: In 1999, Earned Income Tax Credits lifted 4.6 million people above the poverty line (Berube and Forman 2).

Additional benefits for impoverished families are offered through the means-tested Temporary Assistance for Needy Families (TANF) program. States offer welfare

benefits from federal block grants, and individual recipients receive aid for up to two years at a time, up to a lifetime maximum of five years. Currently, half of all TANF recipients are required to be in some work-related activity 30 hours per week, and new proposals would require 70 percent of all TANF recipients to work 40 hours per week (Pear, Lyter et al). States may extend the lifetime limit if no more than 20 percent of the caseload has exhausted the five-year limit. States are not allowed to use federal TANF money to assist most legal immigrants until they have been in the US for five years, though they may use funds from their own state-funded welfare programs (called Maintenance of Effort funds) to assist these immigrants. Fewer than half do so (Coven).

Subject to wide variation at the discretion of each state, benefits include cash assistance, wage supplements, child care subsidy, education and job training, and transportation (Coven). When offering benefits, states must determine that they support the federal goal of TANF to end the reliance of poor parents on government money by promoting job preparation, work, and marriage (Coven).

Economist Lynn Karoly's congressional testimony explains that while work requirements have increased the employment of TANF recipients, their income has stayed about the same in states that reduce benefits as earnings increase, so those who started in poverty without jobs often remain in poverty *with* jobs. Findings from the Growing Up in Poverty Project show that the income of women who have been moved into jobs from welfare is about $12,000 annually, placing most below the poverty line (Fuller et al). Effects on earnings and employment are most positive when recipients can hold on to benefits while they earn more money (Karoly 7).

Two other goals of TANF are to "prevent and reduce the incidence of out-of-wedlock pregnancies" and "encourage the formation and maintenance of two-parent families" (Coven). Single mothers currently lose some of their benefits if they cannot identify the father of their children so that he can be required to make child support payments to the state, a portion of which is passed on to the mother and children. Wisconsin is the only state that gives mothers on welfare the full amount of fathers' child support payments without reducing benefits. Recent proposals would have all states do as Wisconsin does, because research has confirmed that poor fathers have better relationships and more contact with their children when they know that all their support goes directly to the family. The current policy, which sends law enforcement to hunt down 'deadbeat dads' who were behind in child support payments to the state, often drives poor dads further away from their children (Harden).

Child Care

For taxpayers with children, the IRS offers a credit against owed taxes equal to the percentage of a family's income spent on child care, up to a limit of $4,800 (IRS).

Of families 'on welfare,' the proportion in paid employment or work activities increased from 11 percent in 1996 to 33 percent in 1999 (Schumacher, Greenberg and Duffy 13). Acknowledging the increased pressure on parents receiving TANF to find and keep jobs, the federal government has increased child care funding to the states (International Reform Monitor). Demand for child care has outstripped the increase in funding, however, and the policy infrastructure is not keeping up. Recent estimates from the federal government indicate that states are currently assisting only about 10 percent of

the families potentially eligible under federal legislation, while child care costs take up one quarter of the income of families in poverty (Greenberg, Lombardi and Schumacher, Blau 9).

Only one employee in eight benefits from employer-sponsored child care, and Jody Heymann points out that even programs offering tax savings to those able to pay for their own child care (mostly non-poor, of middle- to upper-class status) are available to only three in ten people (Heymann 167).

Marriage/Cohabitation

"Conventional wisdom to the contrary, the United States remains an anomaly with regard to marriage. Americans continue to marry at a significantly higher rate than almost all other people living in the advanced industrialized Western countries" (Kamerman 231-232). The marriage rate is around 8.4 per 1000, much higher than that of the European countries (National Center for Health Statistics).

Federal legislation does not allow homosexual marriage and doesn't give any legal status to cohabiting partners. In 1996, the politically conservative Defense of Marriage Act explicitly defined the terms 'marriage' and 'spouse' as applying only to one man and one woman, and also provided that no state must recognize same-sex marriages contracted in other states, "despite the constitutional rule that each state should give 'full faith and credit' to the public acts of others" (Cott 218).

The state of Vermont, however, enacted a Civil Union law in 2000 which provides eligible same-sex couples legal recognition in civil union, granting "all the same

benefits, protections, and responsibilities under Vermont law…as are granted to spouses in a marriage" (Markowitz).

During the 1990s, the number of cohabiting households in the US increased by 15 percent. In Florida, Michigan, Mississippi, North Carolina, North Dakota, Virginia and West Virginia, male-female cohabitation is illegal, usually a misdemeanor punished by a short prison term or a fine of up to $500. In these states during the 1990s, the number of cohabiting households almost doubled--from about 500,000 to more than 930,000 (Fields).

Divorce

The US divorce rate is around 4.1 per 1,000, which (like the marriage rate) is higher than the rates of other Western nations (Orloff et al 5). Most US states provide no-fault divorce after a period of separation. Some states provide fault-based divorce along with no-fault. The following states do not provide no-fault divorce: Alaska, District of Columbia, Maryland, New Jersey, New York, North Carolina, South Carolina, Vermont and Virginia (Grounds for Divorce).

Single-parent households are increasingly common, partly as a result of the high divorce rate and partly due to the increase in non-marital childbearing. In 1998, single-parent households were 13.4 percent of all families and 9.3 percent of all households (OECD). Female-headed households face a particularly high risk of poverty, and the social safety net beneath these families is relatively weak. About 25 percent of female-headed households live in poverty, and many of these household heads are divorced women (US Census Bureau). In divorce, only full-time homemakers who are residents of

California, Louisiana or New Mexico are entitled to half the family's assets (Crittenden 6).

JAPAN

Social welfare spending is very low in Japan (an even smaller percentage of GDP than the US spends) because caring for people—young and old—has traditionally been a basic responsibility of the family, with a rigid sexual division of labor that went largely unchallenged, ideologically (Sumitaka 5).

Japanese working mothers shoulder the most severe double burden of all the nations discussed here. Japanese husbands take minimal responsibility for child care and housework. Most Japanese wives in the past were able to rely on the help of their mothers-in-law, as extended family, three-generation households were common, but the isolated nuclear family is becoming the norm. Working mothers face a new combination of pressures to fulfill both what is expected of a traditional male employee and an involved, traditional mother. The support system for working mothers is inadequate. This pressure partly explains Japanese women's reluctance to have children. Women surveyed as to why they limit their childbearing commonly cited stress and anxiety associated with childrearing (Atoh 6).

Changes concerning the increasing rate of working women (41 percent) and the very low fertility rate (about 1.38 children per woman) have pushed Japan to politically address work-family conflict, however. The Japanese are principally concerned with easing women's burdens on the employment end to encourage more childbearing. The main policy strategies are offering allowances and maternity leave while promoting part-

time work and work from home (Ministry of Health, Labor and Welfare). These arrangements, of course, are supplementary to the primary support of a husband's income. Japan's divorce rate is very low, and their social policy is based on the assumption that single parent families are not a major social issue.

Parental Leave

Per the Child Care Leave Law of 1992, (Appelbaum et al 28, International Reform Monitor).

Between 1992 and 1996, however, just 16 percent of married women under 30 and 19 percent between 30-34 took up leave. 46 percent gave the reason that they preferred to quit work completely to take care of their children, and 15 percent gave the reason that the "atmosphere at their workplace made it difficult to take the leave" (Kojima and Rallu 340).

In an attempt to end the discrimination that contributed to this difficulty, the Child Care Leave Law was partially revised in November 2001 to prohibit employers from firing, downgrading full-time workers to part-time workers, laying off or demoting employees who apply for child care leave (Japanese Institute of Labor). The original Equal Employment Opportunity legislation had no teeth (Strober and Kaneko Chan 12).

Child Benefits/Family Allowances

Upon the birth of a child, families are paid a benefit equal to $2,448.98 (International Reform Monitor).

Child allowances of $50 a month for the first and second children and $100 for subsequent children are available to low-income families with children up to age six, and

tax relief is available as well. Recent legislation doubled the number of children to receive this benefit by widening the income threshold within which families are eligible (Sims).

Supplementing the modest government subsidy, some Japanese employers are beginning to offer employees bonuses for having babies (Sims).

Child Care

Very little child care service is provided in Japan, as most of the family policy is aimed at maintaining informal, private care in the home. Recently, though, the Japanese government has started offering subsidies for companies to set up and operate on-site child care facilities for newborns and toddlers of employees (Appelbaum et al 32).

Marriage/Cohabitation

Of the countries discussed in this paper, Japan's marriage rate is second to the United States (8.4) at about 6.4 per 1000 ("The Present Status").

Cohabitation is an extremely rare phenomenon in Japan and limited to urban areas. Barely five percent of women under 30 reported having cohabited (Kojima and Rallu 334-335).

Divorce

Japan's divorce rate is relatively low but increasing: about 20 percent of marriages in the early 1990s, up to 31 percent in 1998 (Peng 117, OECD). And contrary to the common assumption that the prevalence of divorce in a country can be explained

by its legal system, the low divorce rate in Japan can't be explained by legal factors: "Japanese divorce laws, which are national rather than regional statutes, allow for quick, easy, no-fault divorce" (Brinton-Lee 5).

GERMANY

Germany's family policy is somewhat paradoxical in that it is open to contemporary family rearrangements and yet shows a definite preference for 'traditional' family structures when it comes for caring for children and rewarding marriage. German policy is much more accepting of nontraditional forms of commitment than the US. For example, single parenthood and out-of-wedlock childbearing carry no social stigma, the children of committed cohabiting couples have the same entitlements as those of married parents, and Germany recently legalized the registration of same-sex life partnerships.

These partnerships are not real same-sex *marriages*, however. The rights of filing taxes jointly and adopting children are still reserved for heterosexual marriage. German family policy is anchored in the ideology of the Christian Democrat party, which politically reinforced the preference for traditional marriage and at-home motherhood (Bahle). Germany's parental leave policies, for example, seem idyllic to many US women because they offer so much well-paid time off, yet they often serve to discourage women from going back to work because women fall so far behind in wages and promotions during leave. The lack of affordable, viable child care and the incompatibility of school hours with work hours also discourages mothers from going back to work.

The importance of child care as a work support is demonstrated by the changes that have occurred in the former East Germany since reunification. In 1989, 80 to 95 percent of children under 10 in the German Democratic Republic were in free day care. 91 percent of women worked full time; 62 percent of married mothers were employed (compared to 28 percent in the West) and 89 percent of single mothers worked (45 percent in the West) (Adler). The socialist government of the GDR provided extensive child care services (often linked to workplaces), generous family allowances and housing subsidies (Folbre 256).

With reunification, coverage of free child care dropped by between 56 and 94 percent, depending on the age of the child. In 1990, housing and child care subsidies from the state were phased out, and when factories shut down, so did their on-site child care centers. By 1994, women's full time employment was reduced to 74 percent, and mothers with young children are now nearly half as likely as they were in 1991 to work full time. In the mid-1990s, women made up 65 percent of the unemployed in the East (Adler).

East German families had been accustomed to a high level of state support and economic stability, but many aspects of this were dismantled in reunification. The severe reduction of entitlements and the new economic insecurity has discouraged women in the former East from forming families as readily as they used to: fertility has dropped to less than one child per woman from 1.6 and marriage rates have declined to 3.4 per 1,000 from 7.9 per 1,000 (Adler).

Interestingly, it is precisely due to the reduction of demand for child care, caused by the drop in fertility and maternal employment, that some affordable public child care

for infants and school-aged children still survives in the former GDR. Responsibility for child care provisions shifted from the central government to local communities, and these communities couldn't have borne the cost of the provisions if fertility and maternal employment had remained high (Hank and Kreyenfeld 10). In the long run, however, it is likely that the availability of child care slots will diminish to match coverage in the West.

Overall, in 2000, 43.5 percent of German women over age 15 were in the labor force (OECD). About 73.4 percent of women between ages 25 and 39 were employed in 1995 (Trifiletti 83).

Parental Leave

German women are entitled to a 14-week job-protected, paid maternity leave, eight weeks of which are taken postnatally (14 weeks in the case of premature or multiple births). The benefit paid to mothers on leave by the statutory health insurance is 100 percent of the woman worker's net earnings.

Paid parental leave, which can be alternated between the mother and father up to three times, is available at the end of the maternity leave until the child's third birthday. While on leave, parents can work up to 19 hours per week with their employer or, given the consent of the existing employer, with another employer. (Pettinger 125). Six months of the two-year leave is limited to fathers, but only one to two-and-a-half percent of fathers actually take up any parental leave (Pettinger 132, Bettio and Prechal 26), while 96 percent of mothers take it for at least part of the period (Bettio and Prechal 24).

For each child under 12, a working parent has ten days of paid leave to look after a sick child, up to a maximum of 25 days per year for each child.

Child Benefits/Family Allowances

Regardless of parents' income, child benefits can be claimed for children under 18, and they can be extended to dependents up to age 21 (if dependent is unemployed) or up to age 27 if dependents are in school or training. Benefits can be claimed without any age limit if the child is disabled. In 1999, the child benefit was $115.74 for the first and second child, $138.89 for the third child and $162.04 for the fourth and subsequent children. Payments can be smaller in states where the cost of living is lower, and some states keep paying a child care benefit after the entitlement to the federal allowance expires (International Reform Monitor).

Tax exemptions are available for each child in a family, and workers whose income is too low to benefit from this exemption receive a minor monthly supplement to their child allowances (Hofferth and Deich 426).

Two-parent families with annual income below $53,655 or single-parent families with annual income under $34,722 are eligible for a benefit payment for the first two years of the child's life, whether or not the parents were employed before childbirth or take parental leave.

The income levels for calculating eligibility and amount of benefit payment have not been adjusted for wage/cost of living increases since the benefit was introduced, so the benefit is worth less than it was worth originally, and fewer families are eligible for it (Pettinger 125-126).

Child Care

Recent legislation entitles every child aged three through six to a place in kindergarten, but what's actually available is a place in a relatively expensive part-time center offering just five hours per day without a lunch. These hours, like those of German schools, conflict with full-time work schedules (Bettio and Prechal 31). This is because German child care provision is not primarily meant to facilitate maternal employment; it's dedicated solely to providing quality education and care for children. Less than 10 percent of infants and school-aged children are enrolled in child care, while about 85 percent of preschoolers three years and older were in Kindergarten (Hank and Kreyenfeld 8).

Marriage/Cohabitation

In 1995, 5.3 per 1,000 adults were married, a slightly higher rate than in Italy and France (European Institute of Women's Health). For women, the average age at first marriage is 27.7 and for men it is 30.1 (Ostner 93).

In the summer of 2001, the federal government of Germany legalized same-sex 'registered life partnerships,' which grant homosexual unions the surname-sharing, inheritance and health insurance rights associated with marriage, but not the tax advantages or the right to adopt children ("Same-Sex Partners").

Germany has updated its definition of what constitutes a family for policy purposes in light of the fact that contemporary couples are reluctant to marry and defer having children: 'a family is where children are' is the decision of the new Red-Green

coalition government (Ostner 90). In 1992, the German Constitutional Court designated that cohabiting partners may be considered to be in a 'marriage-like relationship' if they have "a community (*Gemeinschaft*) of a man and a woman which is intended to last and to be mutually exclusive" (98).

The increase in cohabitation and the entitlements of cohabitants brought with it some stretching of the legal concept of marriage, but ultimately traditional marriage is privileged above other partnerships and living forms. Joint filing of taxes is reserved for married couples. Germany is one of the few industrialized countries other than the US with a joint-filing system.

Divorce

In 1998, 46 percent of marriages in Germany ended in divorce (OECD).

As in the US, divorced German mothers face a high risk of economic hardship. The poverty rate of single-mother families in Germany is 39.1 percent, compared to the country's overall poverty rate of 7.1 percent (Orloff et al 111). Overall, lone parent families were 2.4 percent of all households in 1999 (OECD).

Unlike the United States, however, single parenthood and divorce draw no social stigma (Ostner).

FRANCE

French family policy shows a more comprehensive commitment to offering choices to all working mothers than the other countries discussed in this paper. The

French never set out the way other countries did to restore the place of women in the home: The first paid maternity leave was introduced in 1913 (Lewis 166), and public child care is more affordable and widely available than in the other countries discussed in this paper. In addition, France offers generous family allowances and parental leave benefits that were conceived of as replacement of foregone wages rather than as wages for motherhood, as is the case in Germany, despite the influence of pronatalism in the early twentieth century (Lewis 166, Erler 61).

Even though generous parental leave benefits and universal family allowances make it possible for more French women to stay home, almost the same proportion of French women as American women are employed (respectively 46 percent and 47 percent). But many US women work part time; a higher proportion of French women work full time, especially single mothers, in large part because they have access to high-quality, state-run, subsidized child care. In France, 25 percent of zero- to two-year-olds and 95 percent of three- to five-year-olds are in public child care (Lewis 170, 164). As of 1995, 78.8 percent of women between 25 and 39 (those most likely in their childbearing years) were employed (Trifiletti 83).

In recent years, however, means-testing of benefits has been promoted. This emphasis on vertical redistribution (as opposed to horizontal, which has typically been a guiding principle of French family policy) may encourage lower-income women in particular to stay at home, especially when these women also receive pronatalist benefits that pay more and give longer leave for third births. Means-tested allowances have benefited single wage earners more than working wives because single-mothers' income is likely to be lower, so they are more likely to qualify for additional benefits (Lewis

167). Recently, the number of lone mothers receiving the means-tested lone parent allowance increased, as did those benefiting from the means-tested housing allowance (Kamerman and Kahn 511).

Despite the problems of low economic growth, high rates of social expenditures, and high, persistent unemployment rates as well as a deficit in the social security system through the 1990s, France increased the basic universal family benefit, choosing to constrain spending on pensions and health care instead.

Parental Leave

France offers all women workers a paid, job-protected maternity leave six weeks before and 10 weeks after the births of the first two children, eight weeks before and 18 weeks after the birth of the third child, 34 weeks (12 prenatally) for twins and 42 weeks (24 prenatally) for multiple births. Maternity leave, pre- and postnatally, is mandatory (Ruhm and Teague 135). The benefit paid over maternity leave is equal to the woman's net salary, within certain limits. For insured mothers, benefits equal 80 percent of earnings for up to 16 weeks for the first and second child, 26 weeks for subsequent children and 46 weeks for multiple births (International Reform Monitor).

At the end of the maternity leave, paid parental leave is available to either parent until the child turns three or if at least two children at home need care. The parent is then re-integrated into the previous or a similar job. Women are virtually the only employees to take parental leave, despite its availability to fathers.

Child Benefits/Family Allowances

All families with at least two children under 18 are granted family allowances. In 1999 the allowances for two children were $93.78, for three children $213.90, for four children $334.02, for 5 children $454.27, for 6 children $574.39, and for each subsequent child $120.12 (International Reform Monitor).[1] The value of French child benefits for a couple with two children was equal to about 9.5 percent of the average 1992 male wage (Bettio and Plantenga). This is the highest benefit value of the countries discussed in this paper.

France offers several means-tested benefits for income supplementation, single parents, adoption, parents who reduce their professional activity to stay home with children, special education, schooling of children, and housing (International Reform Monitor, European Commission).

Child Care

Younger children are entitled to places in full-day child care centers (creches) and sometimes family day care. Beginning at age two and a half or three, children are served in all-day preschool programs, the *ecoles maternelles*, for which families pay on a sliding scale. Lower-income families usually pay nothing and better-off families pay no more than 10 to 15 percent of their income for this service (Gornick and Meyers 3).

Nearly all children enroll in *ecoles maternelles*, even if they have an at-home parent, because these nursery schools have become such an effective mode of socialization, education and cultural reproduction (Bergmann 30). The schools are very

[1] Early March 2002: 1 FRF = approximately 0.15 Euro. 1 Euro = approximately 0.91 US dollars. Dollar equivalents of benefits were calculated with these exchange rates.

important in preparing the vocabulary and communication skills of young children for the social and academic rigors of the first grade (Stanley).

France also offers allowances to defray the costs of hiring child care, at home or in registered facilities, for children under three (International Reform Monitor).

Marriage/Cohabitation

In France, about 4.4 of 1,000 women were married in 1995—a rate almost half that of the US (European Institute of Women's Health), and for women, the average age at first marriage is currently about 28. For men, it's about 30 (Ford).

The age at first marriage has increased by about five years over the past twenty years, mostly because couples are more and more likely to spend several years cohabiting prior to legal marriage (Ford).

Pushed by awareness of cohabitants as a growing demographic group and the gay and lesbian rights movement, France has politically accepted the trend toward cohabitation and legally acknowledged the need for homo- and heterosexual cohabitants to have legal rights for themselves as a couple and for whatever children they might have. In 1999 France enacted the Civil Solidarity Pact law (Pacs), a new code giving legal stature to gay and straight couples traditionally considered unmarried (Q Online). The registered contract is available to couples of non-relatives of the same or opposite sex. Couples are treated as partners for social security purposes and after three years their income is taxed as if they were married. Property relations are determined by the couple's own contract and the Pacs is terminated by mutual agreement or if one partner marries (Martin and Thery 150-151).

Divorce

France's divorce rate is about the same as America's. No-fault, mutual-consent divorce was introduced in 1975 (Martin and Thery 144).

ITALY

There is tremendous regional variation in Italian social policy, and in addition, the role of the informal labor sector is very strong there, leading to huge discrepancies in family experience, But in general, care of the vulnerable has remained a very important but informal, normative function of the family in Italy, and southern Europe as a whole (Reher 208). State policy reflects this priority by encouraging women to stay at home: On the one hand, parental leave seems quite generous to working women, as it can last up to eight years. On the other hand, public child care for infants and toddlers is locally controlled and very inconsistent, so that women face strong incentives to leave the work force for most of their childrearing years and face severe practical difficulties if they do not. Public policy also reflects the assumption that women will have access to men's wages through marriage, as child benefits are low (Orloff 67).

These factors help explain why Italian women's labor force participation rates are low compared to the rest of Europe. In 1995, 59.8 percent of Italian women between ages 25 and 39 were employed, while the average for European women in the same age group was about 71 percent. For all Italian women, the employment rate was 33.9 percent in 1995, 11 percent below the European Union average (Trifiletti 83, 78).

Nevertheless, even Italy is experiencing a fairly steady influx of women into the labor market. By 2000, 38.9 percent of women over 15 were in the civilian labor force (OECD). Italian girls now have higher average levels of educational attainment than boys do, which suggests that they probably expect to be actively employed most of their lives (Chesnais 731). Though women's employment in Italy is low overall, a higher proportion of those working work full-time, compared to other countries. Part-time work is not as common or available to women as it is in the US and Germany, so Italian women often do not have the opportunity use it to help resolve work-family conflict (Bettio and Plantenga 6).

In the mid-1990s, Italy's fertility rate was around 1.17 children per woman—the lowest among all countries studied in this paper—while couples reported that they actually wished to have 2.2 children, on average. Although there may be many reasons for this discrepancy between ideal and actual fertility, which is the largest in the European Union, it doesn't seem like mere coincidence that the decline in fertility occurred in the same period that the share of child benefits in the social security budget plummeted from 13.3 percent in 1970 to 3.9 percent in 1992 (Chesnais 736, 731).

Parental Leave

Maternity leave is mandatory for the first five months after childbirth (Trifiletti 92), and the benefit is 80 percent of the mother's earnings. At the end of the paid maternity leave, a supplementary period of parental leave, paid by employers at 30 percent of earnings, is available to one or both parents for ten-month periods at any time until the child's eighth birthday (Child Policy International, European Commission). More job-protected leave paid at 30 percent is available for parents who need to care for a

seriously disabled or ill child (Child Policy International). During any additional unpaid leave, employees may ask for some of their severance pay to help with costs. Less than five percent of men take any of the leave offered (Bettio and Prechal 26).

The maternity benefit is not financed by the state from general tax revenues; employers are required to pay it, and they do so reluctantly. Women sometimes avoid making use of their leave entitlements in order to avoid becoming a burden to their employers (Trifiletti 82).

Child Benefits/Family Allowances

Child benefits are paid to employees (they are contingent on employment) with annual income below a certain limit (28,853 Euros) (European Commission). The amount of the benefit is calculated in inverse function to the household income and in direct proportion to the number of family members (International Reform Monitor). For example, a family of four with income up to 10,840 Euros[2] would receive monthly benefit of 250 Euros[3], while the benefit paid to a family of four making between 26,281[4] and 28,853 Euros[5] would be 39 Euros[6] (European Commission). Benefits are increased for handicapped family members.

Italy's financial provisions for families are relatively low in the scheme of provisions of other European countries (Bettio and Prechal 47). The value of tax breaks and child benefits for a couple with two children is equal to about four percent of the average 1992 male wage, less than half the value of French benefits (Bettio and

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[2] Equal to $10,658.87 as of October 2002.
[3] Equal to $245.82 as of October 2002.
[4] Equal to $25,841.90 as of October 2002.
[5] Equal to $28,370.80 as of October 2002.

Plantenga). Italy's child poverty rate is 14.1 percent, close to the US rate of 14.7 percent, while in the rest of Europe rates are under five percent everywhere except the United Kingdom (eight percent), Germany (six percent), and Spain (seven percent) (Rainwater et al 12).

Child Care

Public child care services for very young children at the pre-elementary level are unevenly distributed throughout the country and largely inadequate (Chesnais 731-732). In 1971, a law was enacted to provide parents with infant/toddler care centers, the *asilo nido*, on demand at the local level, but these centers remain more concept than reality. In fact, the compulsory paid maternity leave was implemented around the same time to keep demand low for the service (New 231).

Early childhood education programs—which are not always child care centers meant to support working mothers—for children over three or four years of age thrive throughout Italy, however. Though Italy's preprimary schools widely vary in local administration and style, enrollment is fairly uniform throughout the country. Most of Italy's three- to five-year-olds are enrolled in the *scuola materna* (New 230), whether administrated by the state, municipality or church. The strong local control over these schools enhances community solidarity and has contributed to what are widely considered to be the most outstanding early childhood education programs in the world (New 235), with the city of Reggio Emilia playing a leading role in maximizing local participation. It's important to note that in most cases, these schools are designed solely for education and not to facilitate the employment of the mothers of enrolled children.

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[6] Equal to $38.35 as of October 2002.

Marriage/Cohabitation

The marriage rate in Italy is in between the rates of France and Italy at 4.9 per 1000.

Local authorities in places including Pisa and Bologna recently started offering registration for official cohabitation for same-sex couples, but these partnerships are not nationally recognized (ILGA). Nationally, social policy contains no provisions for same-sex partners.

Divorce

Italy's divorce rate is very low, at below 15 percent (European Institute of Women's Health, Bettio). Italian legislation, with exceptions for the most extreme cases, requires couples to be legally separated for at least three years before being eligible for divorce. Separated couples don't often pursue legally divorced status, especially since divorce financially disadvantages women more than separation (Ronfani 278). De facto separations are about twice the official divorce rate. In 1999, lone parent families made up only 1.1 percent of households (OECD).

Comparing Policy Patterns of Facilitating Maternal Care in the Home and Reducing Family Poverty

Among other advanced capitalist countries, the US is perceived as a social policy laggard with a shamefully high poverty rate. US family policy, relatively undeveloped and narrowly targeted, offers so little support to families that it seems like any step in the direction of the more generous policies of the other countries discussed would be an improvement, since in western Europe and the Nordic countries, social policy has gone a long way toward ameliorating family problems that remain intense in the US, such as work-family conflict and child poverty. But it is important to remember that "guest workers" – the temporary immigrant workers who are a large part of the labor force in many European nations – are seldom eligible for their benefits, and even the most generous, non-exclusionary policies have complicated, sometimes counterintuitive, effects on the welfare of women and children. These issues merit exploration as much as the possible benefits of the US adopting European-style family policies.

In this analysis, I will discuss the mixed effects of maternity leave on women's employment, the surprising lack of a relationship between fertility and maternity leave and fertility and cash benefits, and the factors that complicate the relationship between countries' levels of social spending and child poverty.

Facilitating Maternal Care in the Home

In the introduction, I called job-protected maternity leave[7] the most basic entitlement reflecting political acknowledgment of the economic necessity of working motherhood. In all countries (except for US workers excluded by the FMLA), leave policies at least provide mothers the break they need after childbirth to recover and bond with their infants. In France, Italy and Germany, an additional goal is to facilitate parental care in the home, especially in the latter two countries, where child care services aren't accessible enough to be an alternative for women who would prefer to go back to work sooner.

Generous maternity leaves seem like a liberal social provision in the US political context, yet in Italy and Germany, they have distinctly socially conservative effects because of the economic incentives they create for women to leave the work force during their childrearing years. The more time a woman spends on leave, the more she foregoes in wage growth and promotions. Over time, the opportunity cost of not working diminishes, and the parental leave benefit becomes a wage for motherhood rather than a compensation for wages foregone (Erler 61).

Many German mothers, for example, drop out of the labor force altogether after the end of the leave period. Of West German mothers who took leave between 1990 and 1992, about half hadn't gone back to work several years after their leaves ended (Pettinger 135). In the former East Germany, working mothers lost the generous child care entitlements of the GDR days and were left with maternity leave provisions as their main state benefit. Rates of maternal employment have dropped dramatically. Ironically, then, generous leave programs, denounced by many US conservatives as state

[7] I say 'maternity leave' interchangeably with 'parental leave' because even though France, Italy and Germany all offer fathers the chance to take up some of the parental leave period, leave is taken up by

interference with 'traditional' work-family arrangements, may actually *encourage* male breadwinner-female homemaker families.

Another complexity is introduced when we consider the relationship between maternity leaves and fertility. Common sense might predict that the leaves would reward fertility, or that once mothers left the work force, they might have higher fertility rates than countries with higher proportions of working mothers, such as the US and France. In fact, however, fertility is actually lower in Italy and Germany than in France and the US, and some studies suggest that availability of affordable child case tends to increase fertility more than generous maternal leaves. Researchers believe that the provision of leaves as a substitute for child care discourages many educated women, unwilling to put their careers on hold for long spells, from having children at all. Germany's low total fertility rate is the mean fertility between a relatively fertile group of women, apparently the main leave-takers, and a substantial group of childless women with active professional lives and aspirations (Bettio and Plantenga 23).

This split between women who choose family and women who choose career also exists in Italy, which has the lowest fertility rate of all five countries discussed in this paper. Rossana Trifiletti notes that "it seems that women no longer give up work for family; on the contrary, they give up having children in order to have a job" (84).[8]

Child benefits and family allowances, on the other hand, are two types of provisions that were consciously adopted to encourage women to stay at home and have

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women in these countries at least 95 percent of the time.

[8] A similar low employment-low fertility situation exists in Japan, where the traditional sexual division of labor and expectations of traditional motherhood—rather than actual policy provisions—lead women to choose between career and family. In Japan, mothers maintain extremely close ties to their children and take on great responsibility as their academic coaches. This normative expectation makes motherhood and work incompatible, since day care hardly seems like a good substitute for a mother to Japanese women.

children, as policymakers became concerned with the possible consequences of population decline in the early to mid twentieth century. These programs still offer high payments for three or more births, but they never actually persuaded women to collectively drop their jobs and have lots of babies. The value of benefits and the variety of benefits offered is greatest in France, for example, yet France has more working mothers than Italy, Germany and Japan, and in fact higher rates of full-time work among them.

In other words, fertility rates do not seem responsive to cash benefits or other policies, such as extended maternity leave, that function as wages for motherhood, despite what common sense or policy goals might predict. Cash payments for childbearing were originally conceived as a way to raise the fertility rate by subsidizing women to stay home and specialize in child production, yet the case of France shows that a variety of other social, economic and political factors, including the availability of benefits (such as child care) that allow women to comfortably combine work and parenting, have steered the main function of the subsidies (poverty reduction, which I will discuss later) away from the original goal.

The effects of maternity leave in nations where it is long and generously paid are also more complicated they might seem to many American observers. Fundamentally, job-protected maternity leave policy helps keep women attached to the labor force. In contemporary Italy and Germany, however, where child care provisions aren't widely available as an additional support for working mothers, lengthy paid leave provisions often have the opposite effect of bringing women into the home for long periods of time

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Women dedicated to their careers don't feel that they can pass on this standard of care to their children, and women who do bear children often have only one because childrearing entails such pressure for them.

while they fall behind their male or childless peers in the workplace, leading some of them to drop out altogether.

Reducing Family Poverty

Today, cash benefits are most important in their role in reducing child poverty. Rainwater, Smeeding and Burtless found that countries spending higher proportions of GDP on social programs benefiting families with children have lower child poverty rates. In other words, the percentage of GDP a country spends on non-elderly social programs is inversely correlated with levels of child poverty (11, 12). The US, France and Germany all fit this pattern quite intuitively: In the US, about 14.7 percent of children lived in poverty in the late 1990s, and about 3.7 percent of GDP was devoted to non-elderly, cash and in-kind social expenditure. In France, 2.6 percent of children lived in poverty in the mid-1990s, and 10.7 percent of GDP was devoted to non-elderly, cash and non-cash social expenditure (Rainwater et al). Germany sits in the middle, spending 8.4 percent of its GDP on non-aged cash and non-cash social transfers, with six percent of children in poverty.

The two outliers here are Japan and Italy, demonstrating that this relationship between levels of social spending and poverty can be mitigated by other social, economic and political factors. Japan spends only 1.9 percent of its GDP on non-elderly social welfare, and yet it has an absolute child poverty rate of less than 10 percent (UNICEF). This is largely because jobs have been a much more reliable and adequate source of income for the Japanese, and since divorce is still very uncommon, marriage has retained more of its traditional role of insulating women and children from economic hardship

than in Western nations. The poverty of women and children without access to a man's income is not a major social issue in Japan, due to the persistence of traditional work-family arrangements and job markets. New economic insecurity in recent years will likely change some of this, however.

Italy, on the other hand, spends a good seven percent of its GDP on social welfare for the non-elderly, yet it has a child poverty rate of 14.1 percent, almost as high as that of the US. The high rate in Italy is in some part due to the long-term instability of the Italian economy and high unemployment rate (Saccarelli), but Italy's method of redistributing wealth for social welfare purposes, as compared to the practices of other countries, is more relevant to this paper.

Both Italy and the US share the distinction of having high levels of economic inequality, which is reinforced by the social welfare policy practice of means-testing in both countries. Neither Italy nor the US offers a universal child allowance or guarantees any minimum income, and the means-tested benefits paid are low to begin with, especially in the US. This reproduces income inequality among citizens. Universal benefits, on the other hand, go much further toward making sure that a decent standard of living is available to all citizens and wealth is distributed more equally. Universal flat-rate benefits help to reduce inequality and poverty through mechanisms of taxation[9] and the maintenance of a strong tax base. With the guarantee of cash benefits, people are always able to pay taxes in addition to meeting their family's needs, even when the chips are down.

[9] In France, income tax is calculated progressively to a top rate of 54 percent for income in excess of about $44,200, after allowances and deductions (Huxford).

Countries offering universal benefits, such as France and the Scandinavian nations, tend not to focus as much as the US on their poverty rates because they know that their social provisions will preclude the risk of poverty for nearly all citizens. They are more focused on ensuring the economic well-being of all families. Benefits are offered to all income groups, not only the worst off.

So, while the percentage of GDP a country spends on benefits going to families is generally inversely related to child poverty rates, the case of Italy illustrates that the type of redistribution a country uses is also important. Despite levels of social spending much higher than in the US, Italy's child poverty rate is almost as high as that of the US. Although high unemployment is more significant in the Italian case and the inadequacy of social welfare is more important in the American case, both the US and Italy have high levels of income inequality reproduced by the practice of means-testing.

As another exception to this relationship, Japan's low divorce rate, slow movement of mothers into the work force, and (until recently) good job market represent unusually, persistently traditional arrangements in terms of marriage, work and family. Japanese children have been protected from poverty by an economy that managed to sustain the male breadwinner-female homemaker family (where women and children could live as dependents on a male wage) much longer than could Western economies.

Conclusion

In this analysis, I've discussed trade-offs and complexities in family policy goals and effects as they affect women and children by facilitating maternal care in the home and reducing poverty.

Patterns in Western European nations' family policy can be divided into two general types. Under the first pattern, the social welfare system provides a comprehensive array of universal benefits and services to families, from birth payments and monthly child allowances to places in child care centers and extensive parental leave. Countries investing in such a broad range of choices for families include the Scandinavian countries and France, which have very low child poverty rates as a result of this broadly supportive type of policy. The provision of quality child care services also helps to foster high rates of active employment among mothers.

Under the second general pattern, benefits are non-universal (means-tested or restricted to certain income groups) and lesser in value than provisions under the first pattern, and consequently child poverty rates are higher. Provision of child care services intended to serve working families is generally low and inadequate. Rather than providing employed parents with access to care for children outside their homes, these countries offer subsidized time off (parental leave) as the primary means of support. As shown in the earlier discussion of parental leave, this type of policy has a way of eroding maternal employment, an effect associated with this second pattern of European policy. Although nations under both patterns offer enough paid leave and benefits to give most families the choice of living in the male breadwinner-female homemaker form, this traditional arrangement is more popular than working motherhood only in countries under this second pattern (including Italy and Germany), where child care is inaccessible and parental leave is the only viable choice.

Without any of these provisions on the national level, the US fits neither of these patterns. The American situation is characterized by several contradictions. On the one

hand, ideology often nostalgically reveres married, middle-class stay-at-home mothers and often resents working mothers for their alleged role in "the breakdown of the family." Poor mothers receiving welfare benefits, on the other hand, are resented if they *don't* work and are likely to lose benefits if they marry. Recent proposals would require them to work full time even while they lack anything resembling consistent, affordable access to child care. Another contradiction is that despite the rhetoric, politics and considerable ambivalence, most mothers up the economic ladder through the middle class work outside the home. Yet another is that the low-wage jobs poor mothers are required to take aren't lifting their families above the poverty line.

It's been pointed out before that broader support for all families in the US would reduce poverty more effectively than the current welfare policy and reflect a more realistic assessment of the needs of working mothers and even of the long-term trend of maternal employment itself. But while the lack of political support for families is related to so many of these problematic contradictions, it has also engendered a unique trend toward greater equity in the ways American mothers and fathers share housework and childrearing.

The lack of state support in terms of arrangements for the care of children heightens the need in American families for individuals to actively negotiate the care of children in ways compatible with both parents' work schedules. In Europe, women take their paid leave to stay at home to care for children, but American parents do not have this provision and usually can't afford the loss of one parent's earnings.

Under these conditions, men have put increasing amounts of time into domestic work and child care while women have decreased their hours in these activities, making

the US a gender relations leader in this respect: American men put in an average of about 16 hours of housework weekly, while Japanese men average only about four (Juster, Ono, and Stafford).

This intriguing paradox in the US may be worth investigating for Japan and the European nations (except Nordic countries such as Sweden, where men put in about 24 hours of housework weekly and social policy directly encourages egalitarian parenting) just as much as it is worthwhile for the US to explore the benefits of European policy, and just as it is important for those interested in the advancement of family policy in all nations to examine the more subtle complexities and trade-offs of these policies and their effects.

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